UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v. : No. 18 Civ. 5075(HG)(VMS)

JOSEPH M. LAURA, ANTHONY R. SICHENZIO, and WALTER GIL DE RUBIO,

Defendants.

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PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S NOTICE OF MOTION FOR MONETARY REMEDIES AGAINST DEFENDANTS JOSEPH M. LAURA AND ANTHONY R. SICHENZIO

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of its Motion for Monetary Remedies Against Defendants Joseph M. Laura and Anthony R. Sichenzio, the Declaration of Victor Suthammanont and its attached exhibits, and the Declaration of Neil Hendelman and its attached exhibits, Plaintiff Securities and Exchange Commission (the "Commission") will respectfully move this Court, at the United Stated District Court located at 225 Cadman Plaza East, Brooklyn, New York, 11201, before the Honorable Hector Gonzalez, U.S.D.J., at a date and time to be determined by the Court, for a judgment requiring Defendant Laura to pay disgorgement of \$4,262,060, prejudgment interest of \$2,151,147 and a civil penalty of \$4,262,060 in the form of the proposed judgment attached as Exhibits F to the Suthammanont Declaration, and a judgment requiring Defendant Sichenzio to pay disgorgement of \$1,794,976, prejudgment interest of \$905,960 and a civil penalty of

\$1,794,976 in the form of the proposed judgment attached as Exhibit G to the Suthammanont Declaration.

In accordance with the Court's Individual Practices Section IV.C, the Commission respectfully requests oral argument.

Dated: New York, NY

November 17, 2023

/s/ Victor Suthammanont

Victor Suthammanont
Hayden Brockett
Margaret D. Spillane
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CERTIFICATE OF SERVICE

I hereby certify that, on November 17, 2023, I emailed a copy of the foregoing Notice of Motion for Monetary Remedies Against Defendants Joseph M. Laura and Anthony R. Sichenzio and the supporting memoranda of law and declarations to the following persons:

Kevin O'Connor, Esq.
Peckar & Abramson, P.C.
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Attorney for Defendants Joseph Laura and Anthony Sichenzio

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/s/ Victor Suthammanont
Victor Suthammanont